

March 13, 2018

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

VIA ECF

Re: *In Re: Terrorist Attacks on Sept 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Magistrate Netburn:

I am in receipt of Your Honor's endorsement at ECF No. 3922, scheduling a conference in this matter for March 21, 2018, at 3:30 pm. Because I have a conflict on that date, I am writing to respectfully request that Your Honor adjourn the conference to April 10, 2018. Your Honor's law clerk has provided us with several alternative dates of availability for Your Honor. After conferring with Attorney Haefele, co-liaison counsel for the Plaintiffs' Executive Committee, we have agreed that April 10, 2018, is mutually available for the plaintiffs and me.

The only issue that exists in terms of scheduling is whether this will be an in-person hearing or a telephonic hearing. Attorney Haefele's preference is for both sides to appear before Your Honor in-person. Undersigned counsel's viewpoint is that an in-person hearing will be a waste of money. Attorney McMahon will not be reimbursed for train fare (nor his associate) and will basically lose a day of billable hours.

If the Court decides to hold the hearing in person on the 10th, undersigned counsel would ask that it be scheduled in the afternoon at around 2 or 3 pm, in order to allow him to attend the hearing on time as he will be taking a train from Washington, D.C. Attorney Haefele does not oppose that time selection.

Respectfully submitted,

/s/ *Martin McMahon*
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